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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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LUANN P. GOULD,	:	
	:	05 CV 11118 (PBS)
Plaintiff,	:	
	:	
– against –	:	(ECF FILING)
	:	
LUCENT TECHNOLOGIES, INC.,	:	
	:	
Defendant.	:	
	:	
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**THE PARTIES' MOTION TO
MODIFY THE SCHEDULING ORDER**

The parties, through the undersigned counsel, move to modify the current Scheduling Order as follows:

(1) extend the time to submit pre-trial disclosures pursuant to R. 26(a)(3) from August 11, 2006 to September 11, 2006.

(2) extend the time to serve/file objections to pretrial disclosures from August 25, 2006 to September, 25, 2006.

(3) extend the time to serve/file proposed jury instructions, proposed voir dire, motions in limine, witness/exhibit lists, and any designations of deposition testimony from August 28, 2006 to September 28, 2006.

(4) extend the time to file joint pretrial memorandum from September 4, 2006 to October 4, 2006.

(5) extend the time to serve/file opposition to motions in limine, objections to witness/exhibit lists and counter designation of deposition testimony from September 4, 2006 to October 4, 2006.

(6) adjourn the trial, currently scheduled for September 18, 2006 to the week of October 30, 2006.

This extension of time is being requested because (1) defendant is currently moving for summary judgment and will be submitting its papers within the next two weeks, and (2) unexpected scheduling conflicts, which include witness unavailability and Plaintiff counsel's commitment to another trial scheduled in September 2006, where Plaintiff's counsel will be representing an individual (who is currently in held in custody) on a felony matter.

This is the first request for a modification of the scheduling order in connection with these matters.

EPSTEIN, BECKER & GREEN, PC

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Dated: August 9, 2006